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From: <ptrckhllrd@aol.com>
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Subject: EIS comments
To: azasminerals@blm.gov

Attached are some of my comments which were not submitted earlier

Patrick Hillard

COMMENTS ABOUT THE EIS AS A WHOLE

It is obvious from reading the EIS that many of the investigators have maintained their professional integrity and have conducted a true professional scientific investigation, while others have gone over to the side of the anti-industry radicals, even though many have professional backgrounds. Some of the indicators of an investigator letting his anti-industry bias influence his findings are:

- Deliberate errors in logic, i.e. the conclusion not being supported by the information. An example of this is on page 4-85 of the EIS where the investigator states that elevated levels of arsenic in Miner's Spring are due to the Grandview Mine. The only known connection between the mine and the spring is their proximity. There is no other evidence to indicate that the elevated arsenic is due to the mine. It is possible that the elevated arsenic is present because of the copper and associated mineralization independent of the mine, or that the arsenic originated from some source other than the mine.
- Introducing irrelevant issues. An example of this is on page 3-242 where the investigator infers that miners would be exposed to toxic levels of depleted uranium. Depleted uranium is <u>never</u> encountered in uranium mining and miners do not ingest enough natural uranium to be toxic. Depleted uranium is in a chemical form different from natural uranium. Another example is describing in detail a plant or animal which does not exist in the withdrawal area. Someone merely skimming the document might miss that the plant or animal does not exist in the withdrawal area; is this intentional?
- Inferring that something out of the past is representative of the situation today. An example of this is inferring that modern uranium mining is the same as it was 50+ years ago in the infancy of uranium mining when it was a U.S. government project. Present-day standards for ventilation, dust control, radiation exposure monitoring, reclamation, mine safety, and water control did not exist in the early uranium mines. Many early miners smoked while working, which increases the chances of lung cancer 100-fold, while at present-day mines mere possession of smoking materials is grounds for immediate dismissal.
- Contriving impossible or extremely unlikely situations and presenting them as the norm. An example of this is the investigator describing a situation where animals graze on vegetation which contains wind-borne dust of uranium minerals and are contaminated, then people eat the animals and are also contaminated. This is just an example of impossible or extremely unlikely events described in the EIS.

There are many other examples of misplaced logic and irrelevant conditions in the EIS. All of the above are standard misinformation techniques used by the anti-industry groups and have no place in a professional document.

The great majority of the mining claims are staked on the belt of mineralized pipes because the mining companies know this is where breccia pipes containing orebodies are likely to be found. The radical anti-industry groups chose the proposed withdrawal area not because it warrants protection more than

other areas, but because that is where the mining claims are. House Rock Valley is included in the proposed withdrawal area, not because there are many mining claims there or because orebodies are very likely to be found there, but because the Grand Canyon Trust owns a ranch there. The government agencies writing the EIS should be more open and honest about this.

There are many examples of failing to provide perspective in the EIS, where numbers are quoted without giving anything to compare them to. For example quoting the total amount of gaseous emissions from all the projected mines over a 20 year period gives some large numbers – until they are compared to automobile emissions, non-road equipment emissions, forest fire emissions, and others in table 3.2-5. Many numbers for emissions are included in the EIS, but they are in widely separated sections so that they cannot easily be compared. This may be intentional, as it plays into the hands of the anti-industry groups' misinformation campaign. The average member of the American public would not dig through the entire document to find all the numbers so that they could be compared.

Water consumption at a typical mine should be compared to water consumption at the South Rim, various cities in the surrounding area, and local industries.

Traffic resulting from ore hauling should be directly compared to overall traffic on various highways.

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p 4-15 Table 4.2-7 *Emissions from standby generator*. It appears questionable that a generator which is used only for electric power outages would generate 48 tons per year of CO_2.

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p 4-13 Table 4.2.4 *Incomplete labeling* It appears that the numbers in the table are not completely defined. Are they tons per day, tons per month, tons per year etc?

The Perrin Ranch wind farm north of Williams AZ will be within full sight of route 64, the major route to the South Rim. It will consist of 62 wind generators which will be 480 feet high at the tip of the windmill blades. The blades will be moving and will presumably be white, which will enhance their visibility. It would be interesting to compare this to a single mine headframe 90 feet high which will be stationary and painted a color to blend in with the landscape, and would be a considerable distance from route 64. It would also be interesting to compare the noise of the windmill blades with the noise of a mining operation. If the EIS is assessing the impact of mining on northern AZ it should be in a context with the overall environment, and not singled out as if it were the only use of the land, or the only intrusion on the landscape.